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*Counsel to the Official Committee  
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**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 DALLAS DIVISION**

In re:  HIGHER GROUND EDUCATION, INC., <i>et al.</i> ,  Debtors. <sup>1</sup>	§ § § § § § § § §	Chapter 11  Case No. 25-80121 (MVL)  (Jointly Administered)
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**CERTIFICATE OF NO OBJECTION REGARDING  
 FIRST AND FINAL APPLICATION OF EMERALD CAPITAL  
 ADVISORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
 RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS  
 FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED  
 CREDITORS FOR THE PERIOD OF JULY 17, 2025, THROUGH DECEMBER 16, 2025**

Pursuant to the *Procedures for Complex Cases in the Northern District of Texas*, the undersigned counsel for the above-captioned debtors and debtors in possession (collectively, the “Debtors”) certifies as follows:

1. On January 31, 2026, the Official Committee of Unsecured Creditors (the “Committee”) filed its *First and Final Application of Emerald Capital Advisors for*

<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.veritaglobal.net/higherground>. The Debtors’ service address for these chapter 11 cases is 1321 Upland Dr., PMB 20442, Houston, TX 77043.



*Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisor to the Official Committee of Unsecured Creditors for the Period of July 17, 2025, through December 16, 2025 [Docket No. 740] (the “Application”).*

2. On the same date, the Application was served on the Master Service List via electronic mail, where available, and via U.S. First Class Mail where email is unavailable as indicated in the Application’s *Certificate of Service*.

3. The deadline for parties to file responses to the relief requested in the Application was February 26, 2026.

4. As of the date hereof, no objections or responses to the Application have been filed on the Court’s docket, and the Committee is unaware of any formal or informal objections to the Application. Accordingly, the Committee requests that the Court enter the proposed order attached hereto as **Exhibit A** at its earliest convenience.

Respectfully submitted this 3rd day of March 2026.

**GRAY REED**

By: /s/ Jason S. Brookner

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**Certificate of Service**

I certify that on March 3, 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

*/s/ Jason S. Brookner*

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Jason S. Brookner

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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In re:	§	
	§	Chapter 11
	§	
HIGHER GROUND EDUCATION, INC., <i>et al.</i> ,	§	Case No. 25-80121 (MVL)
	§	
Debtors. <sup>1</sup>	§	(Jointly Administered)
	§	

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**ORDER APPROVING THE FIRST AND FINAL APPLICATION OF EMERALD  
CAPITAL ADVISORS FOR ALLOWANCE OF COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED  
AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR THE PERIOD OF JULY 17, 2025, THROUGH DECEMBER 16, 2025**

Upon the application (the “Application”)<sup>2</sup> of Emerald Capital Advisors as financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”), (i) awarding final compensation to Emerald for services rendered on behalf of the Committee and expenses incurred during the Application Period; (ii) directing the

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.veritaglobal.net/higherground>. The Debtors’ service address for these chapter 11 cases is 1321 Upland Dr., PMB 20442, Houston, TX 77043.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

Debtors or Liquidating Trustee (as defined in the Plan), as applicable, to pay the balance of fees and expenses incurred but unpaid during the Application Period; and (iii) granting such other and further relief as may be just and proper, pursuant to section 330 of the Bankruptcy Code, rule 2016(a) of the Bankruptcy Rules, rule 2016-1 of the Local Rules, and Section F of the *Procedures for Complex Cases in the Northern District of Texas*; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that notice of the Application and opportunity for a hearing were appropriate under the circumstances and no other notice need be provided; and this Court having found that the requirements of the Bankruptcy Local Rules are satisfied by the contents of the Application; and this Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Application is granted as set forth herein.
2. Finding that Emerald's services were necessary and beneficial to the estates at the time performed and that the requested fees and expenses were reasonable and necessary, Emerald's compensation in the aggregate amount of \$383,705.00 in fees and \$5,360.79 in expenses is hereby approved on a final basis.

3. The Debtors or the Liquidating Trustee, as applicable, are authorized and directed to pay Emerald the sum of **\$176,520.00**, representing all unpaid fees and expenses approved in the preceding paragraph.

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

### END OF ORDER ###

Submitted by:

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